

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

HOLOPHANE EUROPE LIMITED, ACUITY BRANDS LIGHTING DE MEXICO S DE RL DE CV, HOLOPHANE, S.A. DE C.V. AND ARIZONA (TIANJIN) ELECTRONICS PRODUCTS TRADE CO. LTD.,

Defendants.

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

YAHAM OPTOELECTRONICS CO., LTD.,

Defendant.

ULTRAVISION TECHNOLOGIES, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,

Defendant.

Case No. 2:19-cv-00291-JRG-RSP
(LEAD CASE)

Case No. 2:19-cv-00398-JRG-RSP

Case No. 2:19-cv-00252-JRG-RSP

DECLARATION OF GLENN D. RICHESON IN SUPPORT OF DEFENDANTS'
RESPONSIVE CLAIM CONSTRUCTION BRIEF

I, Glenn D. Richeson, hereby declare as follows:

1. I am an attorney licensed to practice in Georgia and admitted to practice before this Court. I am counsel at the law firm of Duane Morris, LLP and counsel for Defendants Holophane

Europe Limited, Acuity Brands Light De Mexico S De RL De CV, Holophane S.A. De C.V., and Arizona (Tianjin) Electronics Products Trade Co. LTD., and I am familiar with the facts stated herein, and if called to testify, would competently testify thereto.

2. I submit this declaration in support of Defendants' Responsive Claim Construction Brief.

3. Attached hereto as Exhibit A is a true and correct copy of excerpted portions from the Deposition of Zane Coleman, Ph.D., dated July 7, 2020. Relevant portions of this document have been highlighted for the convenience of the court.

4. Attached hereto as Exhibit B is a true and correct copy of excerpted portions from Ultravision's Opening Claim Construction Brief from *Ultravision Technologies, LLC v. Lamar Advertising Co.*, et al., C.A. No. 2:16-cv-374 (E.D. Tex.), Dkt. 164 [Sealed]. Relevant portions of this document have been highlighted for the convenience of the court.

5. Attached hereto as Exhibit C is a true and correct copy of excerpted portions from the Declaration of Dr. Zane Coleman in support of Ultravision's Reply Claim Construction Brief from *Ultravision Technologies, LLC v. Lamar Advertising Co.*, et al., C.A. No. 2:16-cv-374 (E.D. Tex.), Dkt. 173-01 [Sealed]. Relevant portions of this document have been highlighted for the convenience of the court.

6. Attached hereto as Exhibit D is a true and correct copy of excerpted portions from Lens Design Fundamentals, Second Edition (2010). Relevant portions of this document have been highlighted for the convenience of the court.

7. Attached hereto as Exhibit E is a true and correct copy of excerpted portions from the Academic Press Dictionary of Science and Technology (1992). Relevant portions of this document have been highlighted for the convenience of the court.

8. Attached hereto as Exhibit F is a true and correct copy of excerpted portions from the Outdoor Advertising Association of America (“OAAA”), LED Lighting Guidelines for Outdoor Advertising Owners and Operators (2013). Relevant portions of this document have been highlighted for the convenience of the court.

9. Attached hereto as Exhibit G is a true and correct copy of excerpted portions from United States Patent No. 9,212,803. Relevant portions of this document have been highlighted for the convenience of the court.

10. Attached hereto as Exhibit H is a true and correct copy of excerpted portions from the Claim Construction Hearing in *Ultravision Technologies, LLC v. Lamar Advertising Co., et al.*, C.A. No. 2:16-cv-374 (E.D. Tex.), Dkt. 227. Relevant portions of this document have been highlighted for the convenience of the court.

11. Attached hereto as Exhibit I is a true and correct copy of excerpted portions from The Illuminating Engineering Society’s The Lighting Handbook (10th Ed. 2011). Relevant portions of this document have been highlighted for the convenience of the court.

12. Attached hereto as Exhibit J is a true and correct copy of excerpted portions from the Deposition of Jack Josefowicz, Ph.D., dated July 7, 2020. Relevant portions of this document have been highlighted for the convenience of the court.

13. Attached hereto as Exhibit K is a true and correct copy of excerpted portions from the June 5, 2014 Amendment in U.S. Pat. App. 13/836,612. Relevant portions of this document have been highlighted for the convenience of the court.

14. Attached hereto as Exhibit L is a true and correct copy of excerpted portions from Illuminating Engineering Society, RP-33-99, Lighting for Exterior Environments (1999). Relevant portions of this document have been highlighted for the convenience of the court.

I declare under penalty of perjury that the foregoing is true and correct.

August 4, 2020

/s/Glenn D. Richeson
Glenn D. Richeson

